



**UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT  
SUBMITTAL REPORT**

Created on  
01-FEB-2021  
13:59:43

## Submittal Overview

Operator: BP Exploration & Production Inc. (02481)  
Business Process: Pipeline Permits and Reports  
Submittal Type: Lease Term Decommissioning Application  
Project Name:  
Submittal Coordinator:  
Submittal Status: Submitted  
Submittal ID: 196843060  
Status Date: 01-FEB-2021  
Submittal Description:  
Remarks:

## Metadata

Segment Number(s):  
ROW Number:  
Regulatory Authority:  
Departing Area-Block:  
Terminating Area/Block:  
Departing  
Facility/Well/PPL:  
Terminating  
Facility/Well/PPL:  
ROW Permittee Name:  
ROW Permittee Code:

## Submittal Statuses

Status	Creator	Created	Modifier	Last Modified
Submitted	o-garciaa	01-FEB-2021 13:59:42		
<b>Remark</b>				
Status	Creator	Created	Modifier	Last Modified
Draft	o-garciaa	01-FEB-2021 09:32:18	o-garciaa	01-FEB-2021 13:59:42
<b>Remark</b>				

## Variances

Title:	250.1752 (b) - Regional Supervisor determines that pigging is not practical	Type:	OTHER	Operation Type:	Other
Expiration Date:		Status:	Pending		

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Authority:	30 CFR 250.1752(b)
Regulation Text	(b) Pig the pipeline, unless the Regional Supervisor determines that pigging is not practical; and
Justification:	The flowline jumper will not be pigged prior to removal as the existing egress issue on the SC PLEM2 prevents the pigging the loop without risking loss of production containment. The flowline jumper has operated without any known asphaltene or paraffin issues. The flowline has been flushed with dead oil multiple times using dead oil for diagnostics to identify the location of the egress at SLDV1-3874 located on SC PLEM2.

Title:	250.1752 (c) -Alternate compliance request for flushing the pipeline	Type:	ALTERNATIVE	Operation Type:	Other
Expiration Date:	Status: Pending				
Authority:	30 CFR 250.1752(c)				
Regulation Text	(c) Flush the pipeline.				
Justification:	The flowline jumper will be displaced with methanol & MEG to remove approximately 14 barrels of dead oil prior to flowline jumper removal and retrieval. Prior to removal, the flowline jumper will be displaced alternating methanol & MEG to increase the efficacy of dead oil removal. Displacement fluids have been selected that have densities that are both above and below the existing dead oil, essentially bracketing the existing fluid enabling displacement of entire jumper.				

## Contacts

Garcia, Adalberto	Phone:	Email:	Adalberto.Garcia@bp.com
Contact Type:	Regulatory Contact 1		
Address:			

## Verbal Authorization

NO VERBAL AUTHORIZATIONS

## Payments

	Assign ID	Pay Date	Amount	TX Code	Status
1)	26R57EM1		0.00		

## Checklist

	Question	Resp	Follow-up	Remark
1)	Do any segments traverse though a Sand Sediment Resource Area?	N/A		
2)	Do any segments cross through a fairway or anchorage area?	N/A		
3)	Will all segments be pigged?	N	Please provide justification	See variance request



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for this departure.

- |    |  |   |  |                      |
|----|--|---|--|----------------------|
| 4) | Will all segments be flushed and filled with uninhibited seawater? | N | Please provide justification for this departure. | See variance request |
| 5) | Will all segments be decommissioned by a complete removal?         | Y |  |                      |

## Requests for Information

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**NO RFIS**

## Associated Submittals

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**NO Associated Submittals**

January 29, 2021

U.S. Department of the Interior  
Bureau of Safety and Environmental Enforcement 1201  
Elmwood Park Blvd.  
New Orleans, LA 70123-2394

Attention: Ms. Angie Gobert  
Pipeline Section Chief

Reference: **Application to Modify Lease Term Pipeline – PL Segment No. 16286**  
BP Galapagos Field,  
Mississippi Canyon Area Block 519 OCS-G 27278  
**Removal of Santiago Flowline Jumper (FAY 3875)**

Ladies and Gentlemen:

In accordance with Title 30 CFR Part 250, Subpart J, BP Exploration & Production Inc. (BP) hereby requests approval for the:

Modification to remove Santiago Flowline Jumper (FAY 3875) of the PL Segment No. 16286 located in the Mississippi Canyon Area Block (MC) 519.

BP is proposing the removal of PSN 16286, which consists of 10.75-inch OD flowline jumper connecting Santiago PLEM One (SA PLEM1) and Santiago PLEM Two (SA PLEM2) via flowline hubs. The flowline jumper connects Segment 16283 (SC-SA Infield Flowline) to Segment 16270 (Santiago Flowline/Riser), which connects to the Nakika Platform. BP proposes to decommission and remove the Santiago Flowline Jumper (PSN 16286) as per the attached application. The decommissioning and recovery of the segment will be performed by a dynamically positioned vessel and is estimated to begin operations in 1Q of 2021 with duration of approximately 5 days.

In support of our application and for your review and use, the following documents are enclosed:

- Procedural Narrative – Information per 30 CFR 250.1752
- Service Fee Receipt
- Galapagos Field Layout – Santiagos Drill Center

*Application to Modify Lease Term Pipeline – PL Segment No. 16286  
BP Galapagos Field, Mississippi Canyon Area Block 519 OCS-G 27278  
Removal of Santiago Flowline Jumper (FAY 3875)  
January 29th, 2021  
Page 2 of 2*

The company's contact on technical points will be:

Justin Hermeston  
Office: 832-630-4419  
[Justin.Hermeston@bp.com](mailto:Justin.Hermeston@bp.com)

The company's contact on permitting inquiries and all approval documents will be:

Adalberto Garcia  
501 Westlake Park Blvd.  
Houston, TX 77079  
Cell: (281) 995 2815  
[Adalberto.Garcia@bp.com](mailto:Adalberto.Garcia@bp.com)

If you have any questions or require additional information, please call Adalberto Garcia at (281)-995-2815

Sincerely,



Adalberto Garcia  
Regulatory Advisor

Enclosures

Procedural Narrative – Information per 30 CFR 250.1752 Service  
Fee Receipt  
Galapagos Field Layout – Santiago Drill Center

**§250.1752(a) Submit a pipeline removal application in triplicate to the Regional Supervisor for approval. Your application must be accompanied by payment of the service fee listed in §250.125.**

The Modification application for the decommissioning of a portion of Lease Term 16286 (Santiago Flowline Jumper) is being submitted via online ePermit TIMs system. The paygov fee receipt as per 30 CFR 250.1752 will be attached to this submittal online.

**§250.1752(a)(1) Proposed removal procedures;**

BP proposes to remove Pipeline Segment Number (PSN) 16286, which consists of 10 -inch OD flowline jumper connecting Santiago PLEM One (SA PLEM1) and Santiago PLEM Two (SA PLEM 2) via flowline hubs. The 10" flowline jumper connects PSN 16283 (SC-SA Infield Flowline) to PSN 16270 (Santiago Flowline/Riser), which connects to the Nakika Platform.

The segment is associated with the Corrective Action Plan (CA83P) submitted on February 1<sup>st</sup> of 2021, and the associated shore base is Port Fourchon. Removal operations shall follow the procedure listed below:

1. Ensure decommissioning of PSN 20292 (GVI PLIS TO SA PLEM1 Jumper) has been completed. A separate permit for decommissioning of PSN 20292 will be submitted for approval by Fieldwood Energy.
2. Verify barrier isolation at on SLDV1-3875 located at SA PLEM1.
3. Verify SLDV1-3876 located at SA PLEM2 is open to allow jumper fluid displacement to platform.
4. Flush with methanol & MEG to remove production fluids from the flowline jumper.
5. Cut Jumper Assembly into sections with ROV tooling and recover pipe sections to the surface using a subsea basket. Crane support may be required during cutting operations.
6. Remove Jumper end connections via OEM Tooling and recover to the surface.
7. Deploy Flowline Hub Caps with vessel crane and install on exposed flowline jumper hub(s)
8. Utilize ROV to Perform leak test to verify successful cap installation and barrier integrity.
9. Perform subsea survey as required of existing PLEM locations for new flowline jumper fabrication.
10. Demobilize decommissioning spread to Port Fourchon or Port of Iberia. Dispose of jumper assembly components.

**§250.1752(a)(2) If the Regional Supervisor requires it, a description, including anchor pattern(s), of the vessel(s) you will use to remove the pipeline;**

Dynamically Positioned (DP) construction vessel will be used to remove the Santiago flowline jumper (PSN 16286).

**§250.1752(a)(3) Length (feet) to be removed;**

The below table details the length of PSN 16286 to be removed:

**Table 1: Length to be Removed**

Equipment Name	Tag Number	Length (ft)	Start	End
Santiago Flowline Jumper (PSN 16286)	FAY-3875	99'-11"	SA PLEM1	SA PLEM2

**§250.1752(a)(4) Length (feet) of the segment that will remain in place;**

The 99 feet of PSN 16286 will be removed. No length of the segment will remain in place.

**§250.1752(a)(5) Plans for transportation of the removed pipe for disposal or salvage;**

The Santiago Flowline Jumper (PSN 16286) will be removed and then transported by marine vessel to Port Fourchon or Port of Iberia for disposal.

**§250.1752(a)(6) Plans to protect archaeological and sensitive biological features during removal operations, including a brief assessment of the environmental impacts of the removal operations and procedures and mitigation measures that you will take to minimize such impacts;**

The Santiago Flowline Jumper (PSN 16286) will be removed from an area that has no known archaeological or sensitive biological features. The jumper is elevated from the seabed and will be lifted out of position without disturbance to the sea floor. An ROV survey shall be conducted prior to the installation of temporary ROV baskets to support pipe section recovery to ensure bottom is free from archaeological, sensitive biological features and existing asset subsea equipment.

**§250.1752(a)(7) Projected removal schedule and duration.**

The early decommissioning window is in February 2021, and it will require a duration of ~5 days.

**§250.1752(b) Pig the pipeline, unless the Regional Supervisor determines that pigging is not practical;**

BP requests approval of alternate compliance per 30 CFR §250.141 to allow jumper removal without pigging. Please see below Alternate Compliance Request section for details.

**§250.1752(c) Flush the pipeline**

BP requests approval of alternate compliance per 30 CFR §250.141 to allow the use of methanol & MEG to displace dead oil from the jumper. Please see below Alternate Compliance Request section for details

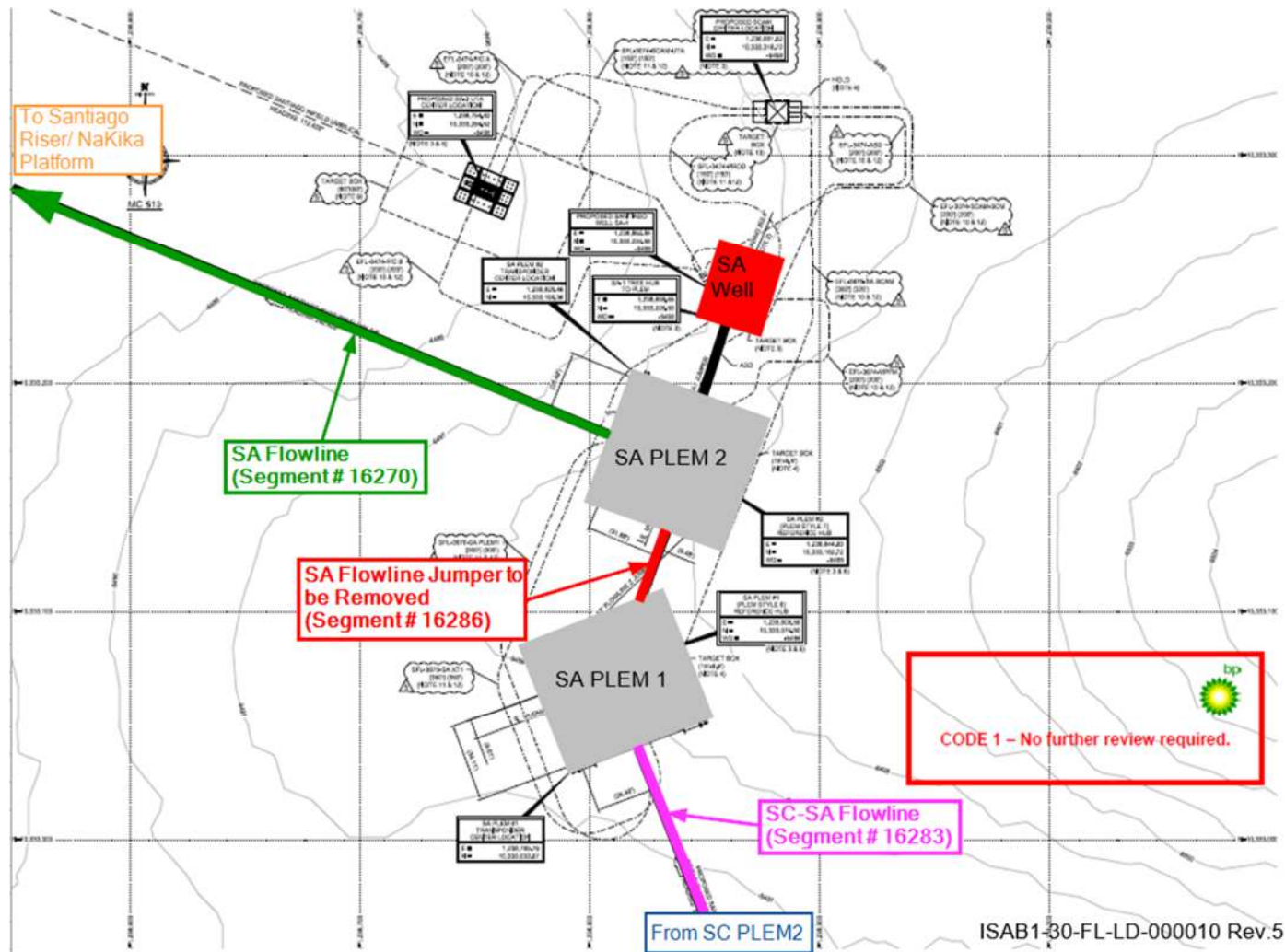


Figure 1: Santiago Drill Center Layout



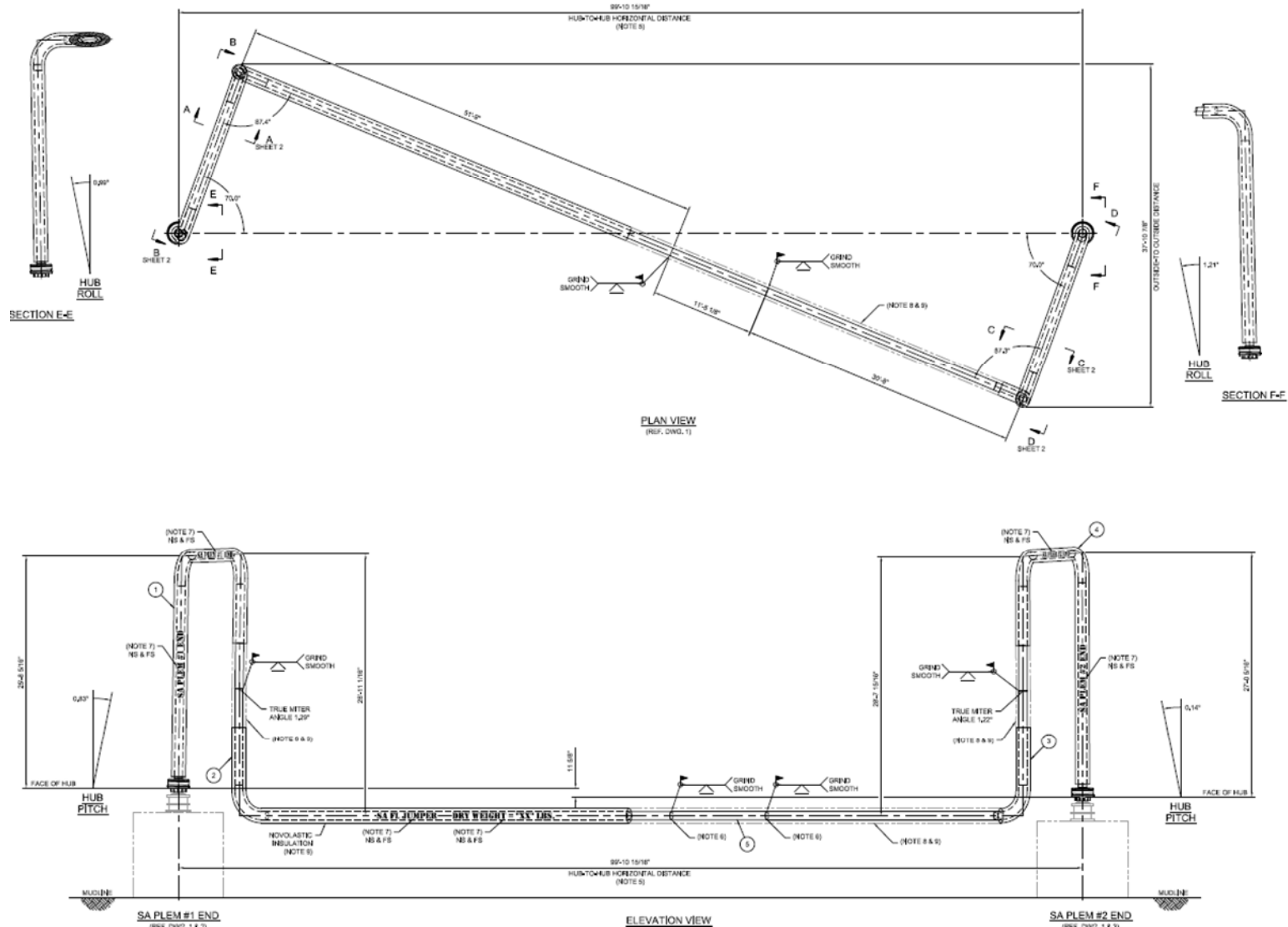


Figure 2: Santiago Flowline Jumper Drawing Details

### Alternate Compliance Request

BP NaKika Galapagos PL Seg 16286

Application to Modify - Removal of Santiago Flowline Jumper (FAY-3875 )

### **§250.1752(b) Pig the pipeline, unless the Regional Supervisor determines that pigging is not practical;**

BP requests approval of alternate compliance per 30 CFR §250.141 to allow flowline jumper removal without pigging.

The flowline jumper will not be pigged prior to removal as the existing egress issue on the SC PLEM2 prevents the pigging the loop without risking loss of production containment.

The flowline jumper has operated without any known asphaltene or paraffin issues. The flowline has been flushed with dead oil multiple times using dead oil for diagnostics to identify the location of the egress at SLDV1-3874 located on SC PLEM2.

### **§250.1752(c) Flush the pipeline**

BP requests approval of alternate compliance per 30 CFR §250.141 to allow the use of methanol & MEG to displace dead oil from the flowline jumper.

The flowline jumper will be displaced with methanol & MEG to remove approximately 14 barrels of dead oil prior to flowline jumper removal and retrieval.

Prior to removal, the flowline jumper will be displaced alternating methanol & MEG to increase the efficacy of dead oil removal. Displacement fluids have been selected that have densities that are both above and below the existing dead oil, essentially bracketing the existing fluid enabling displacement of entire jumper.

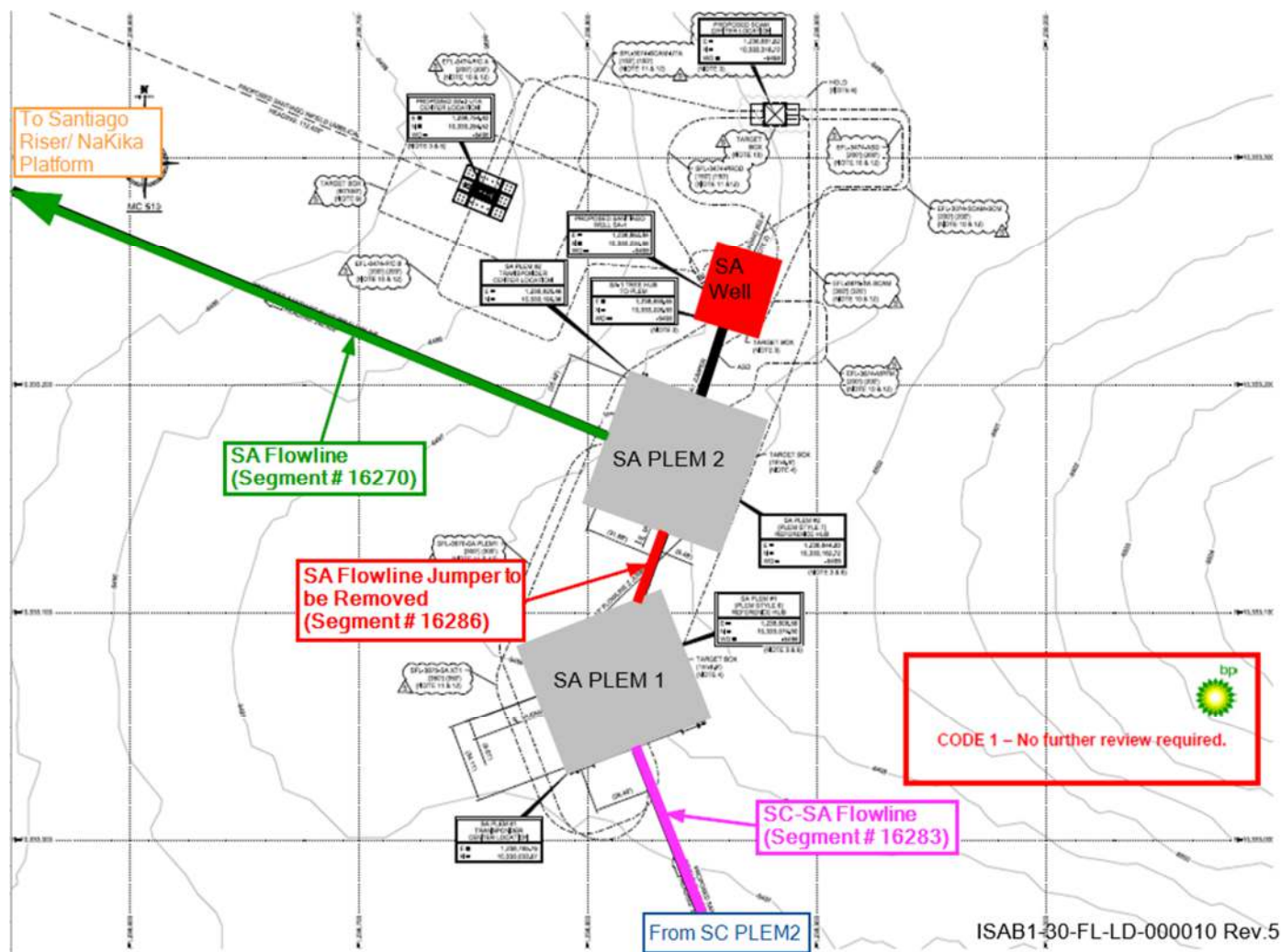


Figure 1: Santiago Drill Center Layout



## Receipt

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### Tracking Information

Pay.gov Tracking ID: 26R57EM1

Agency Tracking ID: 76073401198

Form Name: Application to Decommission a Pipeline - Lease Term

Application Name: BSEE Application to Decommission a Pipeline Lease Term - BV - HCP

### Payment Information

Payment Type: Debit or credit card

Payment Amount: \$1,142.00

Transaction Date: 02/01/2021 02:53:22 PM EST

Payment Date: 02/01/2021

Region : Gulf of Mexico

Contact: Adalberto Garcia

Company Name/No: bp Exploration & Production Inc., 02481

Pipeline Segment No : 16286

Lease Number(s): 27278

Originating Area/Block: Mississippi Canyon MC, 519

Terminating Area/Block: Mississippi Canyon MC, 519

Email Address: adalberto.garcia@bp.com

### Account Information

Cardholder Name: Adalberto Garcia

Card Type: Master Card

Card Number: \*\*\*\*\*1978